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*Via ECF*

November 12, 2021

Hon. Lorna G. Schofield  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *The Travelers Indem. Co., et al. v. Northrop Grumman Corp., et al.*,  
Case No. 16-civ-8778-LGS [rel. 1:12-cv-03040-KBF]**

Dear Judge Schofield:

Pursuant to Rules I.B.1 and I.D.3 of this Court's Individual Rules and Procedures for Civil Cases, Northrop Grumman ("NG") respectfully requests that the Court issue an order authorizing NG to file under seal three exhibits that the Court previously authorized the parties to file under seal. *See* ECF 212, Joint Exhibits 45-46 and 49, Stipulation Regarding the Parties' Joint Exhibits; ECF 193 (Order granting the parties' requests to file papers under seal). NG intends to file these exhibits with its Rule 56.1 Statement of Facts and accompanying declaration in support of NG's Motion for Summary Judgment That Century and Travelers Have a Duty to Defend the *Romano* Lawsuit. Consistent with the practice of the parties and numerous prior orders of the Court, NG seeks permission to seal these exhibits because they contain information and assertions that may prejudice NG's ongoing defense of pending underlying matters.

**Background:** The practice of the parties throughout this litigation, as approved by the Court, has been to file under seal and in redacted form documents and information that are confidential, that contain sensitive business information, or that have the potential to prejudice NG's ongoing efforts to resolve underlying matters that are the subject of this coverage action.

Accordingly, in connection with the parties' dispositive motions briefed during 2018 and 2019, the parties requested permission to file supporting memoranda, oppositions, and reply papers under seal and in redacted form. In three separate orders dated December 18, 2018, January 22, 2019, and February 8, 2019, the Court granted the parties' various requests to file papers under seal. In so doing, the Court accepted the parties' proposed redactions and directed the parties to "redact[] all information identified by the parties as confidential and prejudicial." *See* ECF 193 ("The proposed redactions and sealed filings are narrowly tailored and necessary to prevent the unauthorized dissemination of sensitive business information, and to avoid competitive disadvantage."); ECF 215 (same); ECF 235 (same). Likewise, in connection with the summary judgment briefing in 2020, the parties again requested permission to file materials under seal, and the Court again granted these requests. *E.g.*, ECF 335; ECF 338.

**Request To Seal Three Exhibits Previously Filed Under Seal:** In connection with NG's summary judgment motion being filed today, NG respectfully requests permission to seal three exhibits that were previously filed under seal in this matter. The exhibits are correspondence with NG's insurers, and they contain characterizations of Grumman's historical operations that may prejudice NG's ongoing efforts to resolve the underlying matters. As with numerous prior filings in this matter, NG respectfully submits that its request to file these exhibits under seal is necessary to protect its interests. Moreover, the Court previously issued an order directing the parties to file these same three documents under seal. *See* ECF 193.

Therefore, in accordance with the Court's Individual Rules and Procedures for Civil Cases, NG will file these exhibits under seal electronically through the Court's ECF system. NG is also enclosing an appendix that identifies all attorneys of record who should have access to the sealed documents.

Respectfully submitted,

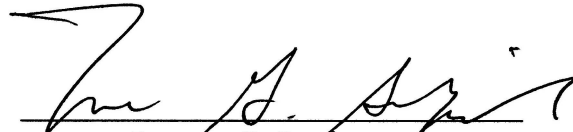
/s/ Georgia Kazakis  
Georgia Kazakis

cc: All Counsel of Record

Defendant's sealing application is **GRANTED** for substantially the reasons stated in Defendant's letter. Exhibits 6 - 8 of Dkt. No. 443 shall be sealed with access limited to the parties listed in the appendix at docket number 441. Defendant shall file the redacted documents on the public docket by **November 22, 2021**.

The Clerk of Court is respectfully directed to close the motion at docket number 441.

Dated: November 15, 2021  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

**APPENDIX:**

**All Attorneys of Record Who Should Have Access to  
the Exhibits Filed Under Seal**

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